

1 Andrew H. Wilson, #063209  
WILSON, RYAN & CAMPILONGO  
2 235 Montgomery Street  
Suite 450  
3 San Francisco, CA 94104  
(415) 391-3900  
4 (415) 954-0938 (FAX)

5 Laurie J. Bartilson  
BOWLES & MOXON  
6 6255 Sunset Boulevard  
Suite 2000  
7 Los Angeles, CA 90028  
(213) 661-4030  
8 (213) 953-3351 (FAX)

9 Attorneys for Plaintiff  
CHURCH OF SCIENTOLOGY INTERNATIONAL

**RECEIVED**  
**NOV 23 1993**  
**HUB LAW OFFICES**

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 FOR THE COUNTY OF MARIN

13 CHURCH OF SCIENTOLOGY )  
INTERNATIONAL, a California not- )  
14 for-profit religious corporation; )  
15 Plaintiff, )  
16 vs. )  
17 GERALD ARMSTRONG; MICHAEL WALTON; )  
THE GERALD ARMSTRONG CORPORATION, a )  
18 California for-profit corporation; )  
Does 1 through 100, inclusive, )  
19 Defendants. )

CASE NO. 157 680  
DECLARATION OF ANDREW H.  
WILSON IN SUPPORT OF  
MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS  
FROM DEFENDANT GERALD  
ARMSTRONG  
[FILED CONCURRENTLY WITH  
PLAINTIFF'S MOTION TO  
COMPEL PRODUCTION OF  
DOCUMENTS FROM DEFENDANT  
GERALD ARMSTRONG, FILED  
UNDER SEPARATE COVER]

22 ANDREW H. WILSON deposes and says:

23 1. My name is Andrew H. Wilson and I am one of the  
24 attorneys responsible for the representations of the Plaintiff in  
25 this action. I have personal knowledge of the facts set forth in  
26 this Declaration and could competently testify thereto if called  
27 as a witness.

28 2. Attached hereto and incorporated herein are true and

WILSON, RYAN & CAMPILONGO  
235 Montgomery Street, Suite 450  
San Francisco, California 94104

1 correct copies of documents submitted as exhibits in support of  
2 Plaintiff's Motion to Compel Production of Documents from  
3 Defendant Gerald Armstrong:

4 Exhibit A: Plaintiff's First Request For The Production  
5 of Documents By Defendant Gerald Armstrong.

6 Exhibit B: Gerald Armstrong's Responses to Plaintiff's  
7 First Request for Production of Documents.

8 Exhibit C: Letter of October 11, 1993, addressed to  
9 Ford Greene, Esq., by Andrew H. Wilson.

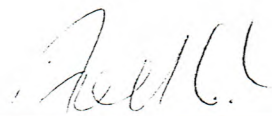
10 Exhibit D: Transcript of August 5, 1993, Entertainment  
11 TV, "Stars and Spirituality."

12 Exhibit E: Order of November 19, 1993, from the  
13 Superior Court of the County of Marin,  
14 California.

15 I received no response to my letter of October 11, 1993,  
16 Exhibit C hereto.

17 I declare under the penalty of perjury under the laws of  
18 the State of California that the foregoing is true and correct.

19 Executed this 23rd day of November, 1993, at San Francisco,  
20 California.

21   
22 \_\_\_\_\_  
23 Andrew H. Wilson

Attached are the exhibits listed in the declaration of Andrew Wilson.

The declaration also lists two orders, given in the motion. One of the orders may have been an oral order, on the ex-parte motion for stay. We have no record of a written order on this. If this is the case, the motion, separate statement and the Wilson declaration need to be changed accordingly.



1 Andrew H. Wilson  
WILSON, RYAN & CAMPILONGO  
2 235 Montgomery Street  
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3 San Francisco, California 94104  
(415) 391-3900  
4

Laurie J. Bartilson  
5 BOWLES & MOXON  
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Hollywood, California 90028  
7 (213) 661-4030

8 Attorneys for Plaintiff  
CHURCH OF SCIENTOLOGY INTERNATIONAL  
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF MARIN

12 CHURCH OF SCIENTOLOGY OF	)	Case No. <i>157680</i>
INTERNATIONAL, a California not-	)	
13 for-profit religious corporation;	)	PLAINTIFF'S FIRST REQUEST
	)	FOR THE PRODUCTION OF
14 Plaintiff,	)	DOCUMENTS BY DEFENDANT
	)	GERALD ARMSTRONG
15 vs.	)	
	)	
16 GERALD ARMSTRONG; MICHAEL WALTON;	)	
THE GERALD ARMSTRONG CORPORATION,	)	
17 a California for-profit	)	
corporation; DOES 1 through 100,	)	
18 inclusive,	)	
	)	
19 Defendants.	)	
	)	

20 DEMANDING PARTY: Plaintiff Church of Scientology International

21 RESPONDING PARTY: Defendant Gerald Armstrong

22 SET NO.: 1

23  
24 Plaintiff Church of Scientology International ("plaintiff")  
25 demands, pursuant to C.C.P. §2031, that defendant, Gerald  
26 Armstrong, produce the items described below, for inspection and  
27 copying by plaintiff's attorneys, on September 13, 1993 at 10:00  
28 a.m. at the offices of Wilson, Ryan & Campilongo, located at 235

1 Montgomery Street, Suite 450, San Francisco, California 94104.

2 DEFINITIONS AND EXPLANATIONS:

3 1. As used herein, the term "document" includes all  
4 written, typewritten, printed and graphic materials of whatever  
5 kind or nature, including, but not limited to, correspondence,  
6 notes, memoranda, telegrams and cables, telexes, telecopies,  
7 panafaxes, publications, contracts, agreements, insurance  
8 policies, minutes, offers, analyses, projections, treatments,  
9 studies, books, papers, records, reports, lists, calendars,  
10 diaries, statements, complaints, filings with any court, tribunal  
11 or governmental agency, corporate minutes, partnerships,  
12 agreements, ledgers, transcripts, summaries, agendas, bills,  
13 invoices, receipts, estimates, evaluations, personnel files,  
14 certificates, instructions, manuals, bulletins, advertisements,  
15 periodicals, accounting records, checks, check stubs, check  
16 registers, canceled checks, money orders, negotiable instruments,  
17 sound recordings, films, photographs, mechanical or electronic  
18 recordings, tapes, transcriptions, blueprints, computer programs  
19 and data, data processing cards, x-rays, laboratory reports and  
20 all other medical tests and test results.

21 2. As used herein, the term "document" further means all  
22 writings, originals and duplicates as defined in California  
23 Evidence Code Sections 250, 255 and 260, whether in draft or  
24 otherwise, including but not limited to, copies and non-identical  
25 copies (whether different from the originals because of notes or  
26 marks made on or attached to said copies or otherwise).

27 3. The words "and" and "or" as used herein shall both mean  
28 "and/or."

1           4. The term "you" as used herein means defendant Gerald  
2 Armstrong, his employees, agents, representatives, attorneys, or  
3 assigns.

4           DOCUMENTS AND THINGS TO BE PRODUCED:

5           1. All documents which in any way constitute, discuss,  
6 evidence, mention, concern, relate or refer to the transfer of  
7 assets, money, liabilities, literary works, works of art, shares  
8 of stock or real, personal, or intangible property of any kind  
9 between you and The Gerald Armstrong Corporation at any time;

10          2. All documents which in any way constitute, discuss,  
11 evidence, mention, concern, relate or refer to the transfer of  
12 assets, money, liabilities, literary works, works of art, shares  
13 of stock or real, personal, or intangible property of any kind  
14 between you and Michael Walton at any time;

15          3. All documents which in any way constitute, discuss,  
16 mention, concern, relate or refer to that document shown on  
17 Entertainment Television's "Entertainment Tonight" on August 5,  
18 1993, and bearing the designation: "ONE HELL OF A STORY An  
19 Original Treatment Written for Motion Picture Purposes Created  
20 and Written by Gerald Armstrong;"

21          4. All documents which in any way constitute, mention,  
22 concern, relate or refer to any motion picture, documentary,  
23 video treatment, teleplay, screenplay, article, story, treatment,  
24 project or script prepared by you which contains any reference to  
25 plaintiff, Scientology, or any of the entities or individuals  
26 listed in paragraph 1 of the "Mutual Release of All Claims and  
27 Settlement Agreement" of December, 1986;

28          5. All correspondence of any kind received by you or the

1 Gerald Armstrong Corporation from Entertainment Television, its  
2 employees, agents, representatives, attorneys, officers,  
3 directors or assigns, after December 6, 1986, which relates to or  
4 concerns the plaintiff, Scientology, or any of the entities or  
5 individuals listed or referred to in paragraph 1 of the "Mutual  
6 Release of All Claims and Settlement Agreement" of December,  
7 1986;

8         6. All correspondence of any kind sent by you or the  
9 Gerald Armstrong Corporation to Entertainment Television, its  
10 employees, agents, representatives, attorneys, officers,  
11 directors or assigns, after December 6, 1986, which relates to or  
12 concerns the plaintiff, Scientology, or any of the entities or  
13 individuals listed or referred to in paragraph 1 of the "Mutual  
14 Release of All Claims and Settlement Agreement" of December,  
15 1986;

16         7. All correspondence of any kind sent by you or the  
17 Gerald Armstrong Corporation to anyone which in any way  
18 discusses, mentions, concerns, relates or refers to that document  
19 shown on Entertainment Television's "Entertainment Tonight" on  
20 August 5, 1993, and bearing the designation: "ONE HELL OF A STORY  
21 An Original Treatment Written for Motion Picture Purposes Created  
22 and Written by Gerald Armstrong;"

23         8. All correspondence of any kind received by you or the  
24 Gerald Armstrong Corporation from anyone which in any way  
25 discusses, mentions, concerns, relates or refers to that document  
26 shown on Entertainment Television's "Entertainment Tonight" on  
27 August 5, 1993, and bearing the designation: "ONE HELL OF A STORY  
28 An Original Treatment Written for Motion Picture Purposes Created



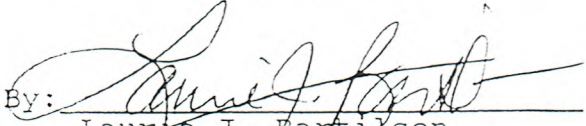
1 and Written by Gerald Armstrong;"

2 9. All correspondence of any kind sent by you or the  
3 Gerald Armstrong Corporation to anyone which in any way  
4 discusses, mentions, concerns, relates or refers to any document  
5 authored by you, in whole or in part, including but not limited  
6 to manuscripts, screenplays, motion picture treatments,  
7 "fictionalizations," plays, articles, or scripts, which discuss,  
8 mention, concern, relate, or refer to the plaintiff, Scientology,  
9 or any of the entities or individuals listed or referred to in  
10 paragraph 1 of the "Mutual Release of All Claims and Settlement  
11 Agreement" of December, 1986;

12 10. All correspondence of any kind received by you or the  
13 Gerald Armstrong Corporation from anyone which in any way  
14 discusses, mentions, concerns, relates or refers to any document  
15 authored by you, in whole or in part, including but not limited  
16 to manuscripts, screenplays, motion picture treatments,  
17 "fictionalizations," plays, articles, or scripts, which discuss,  
18 mention, concern, relate, or refer to the plaintiff, Scientology,  
19 or any of the entities or individuals listed or referred to in  
20 paragraph 1 of the "Mutual Release of All Claims and Settlement  
21 Agreement" of December, 1986.

22 Dated: August 9, 1993

BOWLES & MOXON

23  
24 By:   
25 Laurie J. Bartilson

26 Andrew H. Wilson  
WILSON, RYAN & CAMPILONGO

27 Attorneys for Plaintiff  
28 Church of Scientology  
International

PROOF OF SERVICE

STATE OF CALIFORNIA     )  
                                  )  ss.  
COUNTY OF LOS ANGELES  )

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Blvd., Suite 2000, Hollywood, California 90028.

On August 9, 1993, I served the foregoing document described as PLAINTIFF'S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS BY DEFENDANT GERALD ARMSTRONG on interested parties in this action

[ ] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [ ] the original [X] a true copy thereof in sealed envelopes addressed as follows:

GERALD ARMSTRONG  
715 Sir Francis Drake Boulevard  
San Anselmo, CA 94960-1949

MICHAEL WALTON  
707 Fawn Drive  
San Anselmo, CA 94960

FORD GREENE  
HUB Law Offices  
711 Sir Francis Drake Boulevard  
San Anselmo, CA 94960-1949

THE GERALD ARMSTRONG CORPORATION  
715 Sir Francis Drake Boulevard  
San Anselmo, CA 94960-1949

[X] BY MAIL

[ ] \*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.





1 Ford Greene  
California State Bar No. 107601  
2 HUB LAW OFFICES  
711 Sir Francis Drake Boulevard  
3 San Anselmo, California 94960-1949  
4 Attorney for Defendant  
GERALD ARMSTRONG  
5  
6  
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF MARIN

10 CHURCH OF SCIENTOLOGY INTERNATIONAL,) No. 157 680  
a California not-for-profit )  
11 religious corporation, ) GERALD ARMSTRONG'S  
Plaintiff, ) RESPONSES TO PLAINTIFF'S  
12 vs. ) FIRST REQUEST FOR  
13 ) PRODUCTION OF DOCUMENTS  
14 GERALD ARMSTRONG; MICHAEL WALTON; )  
THE GERALD ARMSTRONG CORPORATION, )  
15 a California for-profit )  
corporation; DOES 1 through 100, )  
16 inclusive, )  
17 Defendants. ) Date:  
Time:  
18 ) Dept:  
Trial Date: None Set

19 DEMANDING PARTY: Plaintiff Church of Scientology International

20 RESPONDING PARTY: Defendant Gerald Armstrong

21 SET NO: One

22 Responses To Documents And Things To Be Produced

23 1. Armstrong objects on the following grounds: the that the  
24 request violates the right to privacy, that the request is not  
25 calculated to lead to the discovery of admissible evidence, and is  
26 irrelevant, constitutes discovery prohibited by the order of the  
27 Superior Court of Los Angeles, is burdensome, harrasive, requires  
28 a compilation, and is compound, overbroad and ambiguous.

1           2.    Armstrong objects on the following grounds: the that the  
2 request violates the right to privacy, that the request is not  
3 calculated to lead to the discovery of admissible evidence, and is  
4 irrelevant, constitutes discovery prohibited by the order of the  
5 Superior Court of Los Angeles, is burdensome, harrasive, requires  
6 a compilation, and is compound, overbroad and ambiguous.

7           3.    Armstrong objects on the following grounds: the that the  
8 request violates the right to privacy and the right to freedom of  
9 religion, speech, press and association, that the request is not  
10 calculated to lead to the discovery of admissible evidence, and is  
11 irrelevant, constitutes discovery prohibited by the order of the  
12 Superior Court of Los Angeles, and is burdensome, and harrasive.

13           4.    Armstrong objects on the following grounds: the that the  
14 request violates the right to privacy and the right to freedom of  
15 religion, speech, press and association, that the request is not  
16 calculated to lead to the discovery of admissible evidence, and is  
17 irrelevant, constitutes discovery prohibited by the order of the  
18 Superior Court of Los Angeles, and is burdensome, and harrasive.

19           5.    Armstrong objects on the following grounds: the that the  
20 request violates the right to privacy and the right to freedom of  
21 religion, speech, press and association, that the request is not  
22 calculated to lead to the discovery of admissible evidence, and is  
23 irrelevant, constitutes discovery prohibited by the order of the  
24 Superior Court of Los Angeles, and is ambiguous, overbroad, vague,  
25 burdensome, and harrasive.

26           6.    Armstrong objects on the following grounds: the that the  
27 request violates the right to privacy and the right to freedom of  
28 religion, speech, press and association, that the request is not

1 calculated to lead to the discovery of admissible evidence, and is  
2 irrelevant, constitutes discovery prohibited by the order of the  
3 Superior Court of Los Angeles, and is ambiguous, overbroad, vague,  
4 burdensome, and harrasive.

5 7. Armstrong objects on the following grounds: the that the  
6 request violates the right to privacy and the right to freedom of  
7 religion, speech, press and association, that the request is not  
8 calculated to lead to the discovery of admissible evidence, and is  
9 irrelevant, constitutes discovery prohibited by the order of the  
10 Superior Court of Los Angeles, and is ambiguous, overbroad, vague,  
11 burdensome, and harrasive.

12 8. Armstrong objects on the following grounds: the that the  
13 request violates the right to privacy and the right to freedom of  
14 religion, speech, press and association, that the request is not  
15 calculated to lead to the discovery of admissible evidence, and is  
16 irrelevant, constitutes discovery prohibited by the order of the  
17 Superior Court of Los Angeles, and is ambiguous, overbroad, vague,  
18 burdensome, and harrasive.

19 9. Armstrong objects on the following grounds: the that the  
20 request violates the right to privacy and the right to freedom of  
21 religion, speech, press and association, that the request is not  
22 calculated to lead to the discovery of admissible evidence, and is  
23 irrelevant, constitutes discovery prohibited by the order of the  
24 Superior Court of Los Angeles, and is ambiguous, overbroad, vague,  
25 burdensome, and harrasive.

26 10. Armstrong objects on the following grounds: the that the  
27 request violates the right to privacy and the right to freedom of  
28 religion, speech, press and association, that the request is not

1 calculated to lead to the discovery of admissible evidence, and is  
2 irrelevant, constitutes discovery prohibited by the order of the  
3 Superior Court of Los Angeles, and is ambiguous, overbroad, vague,  
4 burdensome, and harrasive.

5 DATED: October 4, 1993

HUB LAW OFFICES



6  
7  
8 By: FORD GREENE  
9 Attorney for Defendant and  
10 Petitioners GERALD ARMSTRONG  
11 and THE GERALD ARMSTRONG  
12 CORPORATION  
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28



PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake

Boulevard, San Anselmo, California. I served the following

documents: DEFENDANT GERALD ARMSTRONG'S RESPONSES TO PLAINTIFF'S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS

on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at

San Anselmo, California:

MICHAEL WALTON, ESQ.  
707 Fawn Drive  
San Anselmo, CA 94960

Andrew Wilson, Esquire  
WILSON, RYAN & CAMPILONGO  
235 Montgomery Street, Suite 450  
San Francisco, California 94104

LAURIE J. BARTILSON, ESQ.  
Bowles & Moxon  
6255 Sunset Boulevard, Suite 2000  
Los Angeles, California 90028

[X] (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

[X] (Personal) I caused said papers to be personally service on the office of opposing counsel.

[X] (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: October 4, 1993



cc: K. Burt/San

WILSON, RYAN & CAMPILONGO

ANDREW H. WILSON  
STEPHEN C. RYAN\*  
CHRISTOPHER B. TIGNO  
ANNE R. WOODS  
LINDA M. FONG  
SHAUNA T. RAJKOWSKI  
EDWARD S. ZUSMAN  
IAIN-BREAC MACLEOD  
GREGORY R. DIETRICH

A PROFESSIONAL LAW CORPORATION  
235 MONTGOMERY STREET, SUITE 450  
SAN FRANCISCO, CALIFORNIA 94104  
(415) 391-3900  
TELECOPY (415) 954-0938

OF COUNSEL  
LISA F. CAMPILONGO  
EDWARD L. BLUM

\* CERTIFIED TAXATION SPECIALIST  
THE STATE BAR OF CALIFORNIA  
BOARD OF LEGAL SPECIALIZATION

October 11, 1993

Ford Greene, Esq.  
HUB LAW OFFICES  
711 Sir Frances Drake Boulevard  
San Anseimo, CA 94960-1969

Re: CSI v. Armstrong, et al.,  
Marin County Action No. 157680;  
Discovery Responses  
Our File No. SCI02-003A

Dear Mr. Greene:

I telephoned you this morning to discuss the responses of your client, Gerald Armstrong, to Plaintiff's First and Second Requests for Production of Documents. It is my feeling that fulfilling the "meet and confer" requirements of the Code of Civil Procedure is more productive when done in direct conversation rather than through letter writing. However, at your specific request that I "write you a letter," I write in an attempt to fulfill those requirements. I note initially that The Gerald Armstrong Corporation ("TGAC") did not respond to Plaintiff's First Request for Production of Documents from it, that any objections which The Gerald Armstrong Corporation may have had to the requests contained therein are waived, and I would therefore expect the production to take place as noticed.

I note that the responses to "Document Production Requests" and each request contained therein are identical, and I will therefore address those objections by category below:

1. Objection on grounds that request violates right to privacy, to freedom of religious speech, press and association.

I find this objection difficult to understand. As you know, this action is directed at Mr. Armstrong's conveyance of assets so as to essentially render him judgment-proof. At the same time he was engaging in what he admits (and in fact boasts of) were breaches of the September 6, 1986 settlement agreement between he and plaintiff. I fail to understand how production of the documents requested, all of which are designed to elicit information with respect to those transfers, would infringe on these rights. I also am not aware of any authority which is remotely similar to this case. Unless you can provide me with such authority, I shall expect that you will abandon this objection.

2. Request constitutes discovery prohibited by the order of the Superior Court of Los Angeles. I presume that the "order" to which you refer is Judge Horwitz' orders which stay Action Nos. 052395 and 084642 pending the resolution of your client's appeal from the preliminary injunction entered by Judge Sohigian. Discovery propounded in this action, by definition, was not prohibited by any of these orders. If you are somehow contending that discovery propounded here is relevant only in that action, and hence prohibited, I suggest you tell me which requests you believe are only relevant to the two Los Angeles County actions. The reality is that the discovery propounded here is relevant to this action, and some of it may have marginal relevance to the Los Angeles County action. However, it could only arguably be prohibited if it was relevant only to the Los Angeles County action.

3. Discovery not calculated to lead to discovery to admissible evidence and is irrelevant. It is virtually impossible for me to understand, unless you specify further, on what grounds you make this objection. I have re-reviewed the requests, and am satisfied that they all are calculated to lead to evidence which would be admissible in this action. The requests are all designed to elicit documents which would either reflect transfer which we believe are fraudulent, would show information which would tend to prove that the transfers were fraudulent, or which would reveal existence of further fraudulent transfers. For example, Requests Nos. 1 through 12 of the Second Request to Mr. Armstrong and the First Request to TGAC all relate to the real property transferred to Michael Walton. Unless you can provide me with specific reasons why specific requests are not calculated to lead to discovery of admissible evidence or are irrelevant, I must insist that you not raise this objection as a grounds for refusing discovery.

4. Request is ambiguous, overbroad, vague and harassing. I do not really believe that you have trouble understanding these requests, or that they are overbroad. If you have a problem understanding a specific request, please let me know what request and what your problem is and I will be happy to provide further specifics so that this vagueness/ambiguity will not be a problem. With respect to the requests being overbroad and harassing, they are not. While I doubt that any explanation or argumentation you may provide will cause me to change my mind, I invite you to do so and I will reconsider.

\* \* \*

In conclusion, I expect that you will reply to this letter, letting me know which documents you will produce and which documents you will not produce no later than the close of business on Friday, October 16, 1993.

Very truly yours,

WILSON, RYAN & CAMPILONGO



Andrew H. Wilson

AHW-0735.LTR



**ENTERTAINMENT TV**  
**STARS AND SPIRITUALITY**  
(Controversial Spirituality)  
5 August 1993

N: Narrator (Greg Agnew)  
BF: Bianca Ferrare  
KB: Karen Black  
KA: Kirstie Alley  
MR: Mimi Rogers  
HJ: Heber Jentzsch  
JT: John Travolta

[CAMERA IS ON ANNOUNCER BIANCA FERRARE. THERE IS A SIGN BEHIND HER SAYING "STARS AND SPIRITUALITY".]

BF: Welcome back to E News Daily, our 30 minute look at the latest in Entertainment News. I'm Bianca Ferrare. A celebrity's religion rarely makes headlines. But the spiritual path being explored by some celebrities continues to be the target of controversy and criticism. In an E News Special Report, Greg Agnew explores Scientology.

[SHOT OF TOM CRUISE]

N: Tom Cruise is a firm believer.

[SHOT OF ANN ARCHER]

N: So is Ann Archer. They're just some of the celebrities who say they found spiritual sanctuary in Scientology.

[SHOT OF KAREN BLACK]

KB: What it really does is it enhances the basic person's center, sort of, so that you stay happy and you are continuously sort of big. You don't all get small and big and small and big and hide; and you can confront life and handle it better and there are billions and millions of people who just say the same thing, they are happy and free now.

[SHOT OF KIRSTIE ALLEY]

N: Former Cheers star Kirstie Alley says an interest in Scientology prompted her to join Narconon. The drug rehab program is sponsored by Scientology.

KA: .. And then I kept reading things about Scientology. And then I kept reading things about it and it was very

interesting to me but everytime I'd hit a point it would say, you know, if you are on drugs this will happen or if you are on drugs you can't really get anywhere spiritually.. and so then I realized I have to get off drugs if I am going to pursue this.

[SHOT OF MIMI ROGERS WITH A CHILD.]

N: There was no dramatic discovery of Scientology for actress Mimi Rogers. Her parents were involved with it before she was born.

MR: It's what I grew up with. You know, to that degree it helped form who I am and how I behave in my life.

[SHOT OF TOM CRUISE AND NICOLE KIDMAN]

N: It was while Tom Cruise was married to Rogers that he became a Scientologist. His current wife Nicole Kidman has also become a member.

[SHOT OF GREG AGNEW HOLDING THE BOOK DIANETICS, THE MODERN SCIENCE OF MENTAL HEALTH]

N: Scientology is an outgrowth of the principles outlined in the 1950's book "Dianetics, the Modern Science to Mental Health". It's author, L. Ron Hubbard died in 1984. But Scientology lives on. What exactly is Scientology?

[SHOT OF WHAT IS SCIENTOLOGY BOOK.]

N: According to a book put out by the group, it's the study and handling of the spirit in relationship to itself, universes and other life.

[SHOT OF HEBER JENTZSCH.]

N: Heber Jentzsch, president of Scientology International calls it religious philosophy.

[SHOT OF FRONT OF COMPLEX WITH SCIENTOLOGY SIGN.]

HJ: Well I think everyone asks the questions "Who am I?" "What am I doing here?" "Where am I going?" and so forth. And Scientology gives you the tools to find the answers. Notice I say to FIND the answers. It's not something where you are given the answers and you must believe this. You find the answers.

[SHOT OF FRONT OF COMPLEX WITH SCIENTOLOGY SIGN AGAIN]

N: Scientologists believe answers can be found through a process called auditing. Auditing sessions are intensive

interviews (Shot of E-Meter) that use a sort of lie detector developed by Scientology called an E-Meter. The Church says the machine can pinpoint areas of emotional distress a person needs to work out.

[SHOT OF HEBER JENTZSCH]

HJ: By looking at those past areas of trauma, those past areas of upsets and so forth and by a very precise technology of looking at those and addressing them; removing those from your life it gives one a greater, freer attention as an artist or as an individual.

[SHOT OF BACK OF CHURCH BUILDINGS, LOS ANGELES CHURCH PARKING LOT.]

N: The cost of the process is one of the aspects of Scientology that has drawn criticism.

[ZOOM IN SHOT OF CHURCH OF SCIENTOLOGY SIGN ON SUNSET THAT SAYS "COME IN NOW" AND "TIRED OF BEING TIRED?"]

N: Auditing courses can reportedly cost hundreds of dollars or more. But Jentzsch defends the system:

HJ: It's affordable to anyone. I mean, there are free courses, there are books. Anyone can come into Scientology. It is available to everyone. And there is one other thing which is missing, and that is... in this conversation... that a person who is in Scientology has a technology. He can change his conditions. He can earn more money.

[SHOT OF SCIENTOLOGY SIGN ON HOLLYWOOD GUARANTEE BUILDING AND LRH LIFE EXHIBITION.]

N: What happens when a person tries to leave Scientology has been another point of controversy.

[SHOT OF JOHN TRAVOLTA AND KELLY PRESTON]

N: One of Scientology's celebrity members, John Travolta, has been drawn into that controversy. But the actor denies his experience has been anything but positive since the day he joined.

JT: ... Oh, about 15 years ago and ever since then it's been fantastic.

[SHOT OF HEBER JENTZSCH]

N: Jentzsch is also adamant that any member who wants to leave Scientology is free to do so.



HJ: One can come and one can go. You have that freedom. You many find others who say it's not so. But realize that we have ethical standards and there are people who do not want to meet those ethical standards.

[SHOT OF HOLLYWOOD GUARANTEE BUILDING]

N: What happens when members try to leave Scientology has been another point of controversy.

[SHOT OF OPENING OF LRH EXHIBITION: John Travolta, et al.]

N: One of Scientology's celebrity members, John Travolta, has been drawn into that controversy. But the actor denies his experience has been anything but positive since the day he joined.

JT: Oh, years? About 15 years ago and ever since then it's been fantastic.

[SHOT OF HEBER JENTZSCH]

N: Jentzsch is also adamant that any member who wishes to leave the Church is free to do so.

HJ: One can come and one can go. You have that freedom. You may find others who say it's not so. But realize that we have ethical standards. And there's people who do not want to meet those ethical standards.

[SHOT OF ARMSTRONG, looking at legal papers]

N: Gerald Armstrong says that leaving Scientology in 1982 wasn't that easy for him.

[SHOT OF PAGES OF MEMORANDUM OF INTENDED DECISION]

N: In litigation Armstrong testified that he wanted out, after working for Hubbard and discovering documents that showed the Church Founder lied about his background and achievements. As Armstrong explains in the lawsuit, when he left Scientology he found he needed to take that so-called proof as protection.

[SHOT OF ARMSTRONG, looking at booklet that says "Two Faces"]

N: That got him sued by the Church, labelled an "enemy of Scientology", and allegedly made him a target of the fair game doctrine.

[CLOSE-UP SHOT OF ARMSTRONG]

GA: The actual fair game doctrine states that someone labelled an

"enemy", may be tricked, cheated, lied to, stolen from, sued, or destroyed, by any means, by any Scientologist.

[SHOT OF HEBER JENTZSCH]

N: Jentzsch says today there is no fair game doctrine.

HJ: There was a policy years ago which was misunderstood. A person who leaves the justice system of Scientology can be fair game for this society.

[SHOT OF PAGES OF THE BRECKENRIDGE DECISION]

N: In 1984 a California judge came down on Armstrong's side in his suit versus Scientology. Nine years later the two sides are still at legal odds.

[SHOT OF OTHER COURT DOCUMENTS]

The Church is suing Armstrong, accusing him of breaching the original settlement agreement by speaking out against Scientology.

[SHOT OF HEBER JENTZSCH]

HJ: This is a person who wants to make a big name for himself off of Scientology.

[SHOT OF ARMSTRONG]

N: Armstrong denies the charge. He and his attorney contend the contract is illegal and the lawsuit, improper.

[SHOT OF MANUSCRIPT entitled: **ONE HELL OF A STORY An Original Treatment Written for Motion Picture Purposes Created and Written by Gerald Armstrong**]

N: He eventually hopes to tell his story on the big screen.

[SHOT OF NARRATOR, AGNEW]

N: One of the stories that Armstrong intends to tell is that of OT-III...

[SHOT OF PAGE OF MANUSCRIPT: "THE WALL OF FIRE]

N: ... the story of the "wall of fire".

[SHOT OF NARRATOR, AGNEW]

N: It includes references to the galactic ruler and of beings being transplanted to Earth. So does all this controversy effect the stars who practice Scientology?

[SHOT OF MIMI ROGERS]

MR: ...seems to be cyclic, you know. Every five years or so there's a rash of publicity. And I, I'm not really close to the Church and what goes on organizationally. It doesn't really effect me, frankly.

[SHOT OF CHICK COREA]

N: One celebrity who may be paying the price for his status as a Scientologist is Chick Corea. German officials recently cancelled a planned performance by the jazz musician. They deny the cancellation has anything to do with Corea being a Scientologist, though Corea, his managers, and the Church aren't convinced. The German government and Scientology have long been at odds.

[SHOT OF HEBER JENTZSCH]

HJ: Yes. People take flak for their religious beliefs. But that's, that's just bigotry. That's all it is. You have to question the motives of a bigot.

N: From Los Angeles, I'm Greg Agnew for E-News Daily.

[End of Segment]



SUPERIOR COURT, MARIN COUNTY, CALIFORNIA  
 CIVIL CALENDAR AND MINUTES

M. WALTON  
 456-7920  
 391-3900 F;  
 954-09

RULINGS

A. WILSON

DATE: FRI., NOV. 19, 1993 TIME: 9:00 REPORTER: J. KNETZGER  
 OPPOSITION DUE: 11/12/93 JUDGE: GARY. W. THOMAS CLERK: J. BANKSON  
 REPLY DUE: 11/17/93 DEPT. NO. 1 COMPLETED: \_\_\_\_\_

CASE NO.	TITLE OF ACTION	PROCEEDING	ATTORNEY
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3) 157680	CHURCH OF SCIENTOLOGY INTERNATIONAL V GERALD ARMSTRONG, ET AL		
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THE DEMURRER OF DEFENDANT MICHAEL WALTON ON THE GROUND OF UNCERTAINTY IS OVERRULED. THIS ACTION DOES NOT REQUIRE A DETERMINATION OF WHETHER ARMSTRONG IS LIABLE FOR BREACHING THE SETTLEMENT AGREEMENT. A TRANSFER OF PROPERTY CAN BE FRAUDULENT AND A CREDITOR CAN OBTAIN REMEDIES WITHOUT A DETERMINATION OF THE ULTIMATE VALIDITY OF THE CREDITOR'S CLAIM. (SEE CIV. CODE, §§ 3439.01(b) & (c), 3439.04, 3439.07.) IN ADDITION, THIS ACTION CAN BE PURSUED BEFORE A JUDGMENT IN THE LOS ANGELES COUNTY ACTIONS. (ID.)

THE DEMURRER ON THE GROUND OF FAILURE TO STATE FACTS SUFFICIENT TO CONSTITUTE A CAUSE OF ACTION IS OVERRULED. PARAGRAPHS 29 AND 36 PLEAD FACTS MEETING THE REQUIREMENTS OF CIVIL CODE SECTION 3439.04(a). PARAGRAPHS 30, 31, 37, AND 38 PLEAD FACTS MEETING THE REQUIREMENTS OF SECTION 3934.04(b)(2).

THE MOTION TO STRIKE IS DENIED. AS EXPLAINED ABOVE, THIS ACTION DOES NOT SEEK OR REQUIRE A DETERMINATION THAT ARMSTRONG BREACHED THE SETTLEMENT AGREEMENT. THUS, THIS ACTION IS NOT SIMPLY AN ATTEMPT TO AVOID THE ORDERS IN THE LOS ANGELES COUNTY ACTIONS.

WILSON, RYAN & CAMPILONGO  
235 Montgomery Street, Suite 450  
San Francisco, California 94104

PROOF OF SERVICE

I declare that I am employed in the City and County of San Francisco, California.

I am over the age of eighteen years and not a party to the within entitled action. My business address is 235 Montgomery Street, Suite 450, San Francisco, California.

On November 23, 1993, I caused the attached copy of **DECLARATION OF ANDREW H. WILSON IN SUPPORT OF MOTION TO COMPEL IN SUPPORT OF MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM DEFENDANT GERALD ARMSTRONG; NOTICE OF MOTION AND MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM DEFENDANT GERALD ARMSTRONG; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM DEFENDANT GERALD ARMSTRONG; and DEFENDANT'S SEPARATE STATEMENTS OF DOCUMENT PRODUCTION REQUESTS AT ISSUE** to be hand served via Lightning Messenger Service to the following at the addresses listed below:

Ford Greene, Esq.  
711 Sir Francis Drake Blvd.  
San Anselmo, California

HUB LAW OFFICES  
711 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

Michael Walton  
707 Fawn Dr.  
San Anselmo, CA 94960

Gerald Armstrong  
715 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

GERALD ARMSTRONG CORPORATION  
715 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

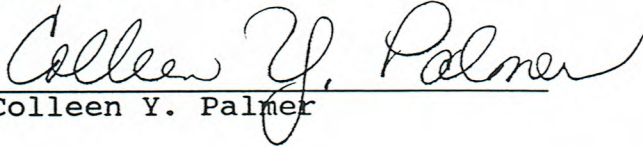
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I declare under the penalty of perjury under the laws of  
the State of California that the foregoing is true and correct.  
Executed at San Francisco, California on November 23, 1993.

  
Colleen Y. Palmer